

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CAMBRIDGE PLACE INVESTMENT
MANAGEMENT INC.,

Plaintiff,

v.

MORGAN STANLEY & CO., INC., *et al.*,

Defendants.

Case No. 1:10-cv-11376

REQUEST FOR ORAL ARGUMENT

**PLAINTIFF'S MOTION TO REMAND
THIS ACTION TO MASSACHUSETTS STATE COURT**

Plaintiff Cambridge Place Investment Management Inc., by its attorneys, respectfully moves this Court for the entry of an order remanding this action to the Superior Court for the Commonwealth of Massachusetts, Suffolk County, Business Litigation Session ("Massachusetts Superior Court") for lack of subject matter jurisdiction pursuant to 28 U.S.C. § 1447(c). In the alternative, Plaintiff respectfully moves this Court for an order abstaining from hearing this action and remanding the action to Massachusetts Superior Court pursuant to either 28 U.S.C. § 1334(c)(2) (mandatory remand) or 28 U.S.C. §§ 1334(c)(1) and 1452(b) (equitable remand). In support of this Motion, Plaintiff relies on its concurrently-filed Memorandum of Law in Support of Plaintiff's Motion to Remand This Action to Massachusetts State Court.

REQUEST FOR ORAL ARGUMENT

Plaintiff believes that oral argument will assist the Court and wishes to be heard. Therefore, Plaintiff respectfully requests that the Court schedule a hearing for oral argument on this Motion.

Dated: September 13, 2010

**CAMBRIDGE PLACE INVESTMENT
MANAGEMENT INC.**

By its attorneys,

/s/ David R. Stickney

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LOCAL RULE 7.1 CERTIFICATION

I hereby certify that counsel for Plaintiff conferred in good faith with counsel for Defendants in an effort to narrow or resolve the issues raised in this motion.

/s/ David R. Stickney
David R. Stickney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing and paper or electronic copies will be delivered to those indicated as non-registered participants on September 13, 2010.

/s/ David R. Stickney
David R. Stickney